



U.S. Department of Justice

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TO VICTIMS OF NEW ALLIANCE

Re: U.S. v. Robert Ross - Docket No. 3:05CR165 (JBA); USAO No. 2004R00674
U.S. v. George Kundrat - Docket No. 3:05CR172 (JBA); USAO No. 2004R00676
U.S. v. Chance Vought, et al. - Docket No. 3:05CR268 (JBA); USAO No. 2005R00548

On October 14, 2005, a federal grand jury returned a 12-count sealed Indictment charging **CHANCE M. VOUGHT**, age 56, of Quogue, New York, and **JOHN M. LUCARELLI**, age 34, of Greenwich, Connecticut, with conspiracy, mail fraud, wire fraud and securities fraud in connection with the *New Haven Savings Bank/NewAlliance Bancshares, Inc.* Initial Public Offering (IPO). The Indictment was returned on October 14th and ordered unsealed on October 26, 2005.

The 12-count Indictment charges VOUGHT and LUCARELLI with conspiring to illegally obtain shares of *NewAlliance Bancshares, Inc.* (NAB) stock. As alleged in the Indictment, VOUGHT, LUCARELLI and their co-conspirators were not eligible to obtain NAB stock at its \$10 Initial Public Offering price because they were not eligible account holders of *New Haven Savings Bank* (NHSB). However, VOUGHT and LUCARELLI are alleged to have participated in a scheme to purchase the stock at that \$10 price by having individuals who were account holders purchase the stock for them. The Indictment alleges that, after purchasing the shares in the names of other people, the members of the conspiracy then sold the shares at a profit, which was shared among the defendants and the other members of their conspiracy. Vought and Lucarelli are the third and fourth individuals charged criminally as a result of this investigation.

On June 28, 2005, Robert Ross waived indictment and plead guilty to Securities Fraud, in violation of Title 18, U.S.C. § 1348(2), and on July 7, 2005, George Kundrat, waived indictment and pleaded guilty to Conspiracy, in violation of Title 18, U.S.C. § 371. Robert Ross is tentatively scheduled to be sentenced on December 12, 2005 at 3:00 p.m. George Kundrat is tentatively scheduled to be sentenced on December 21, 2005 at 11:00 a.m. Ross and Kundrat will be sentenced before the Honorable Janet Bond Arterton, United States District Court Judge, at the Federal Courthouse, 141 Church Street, New Haven, Connecticut.

In cases which involve significant number of victims, the most effective way to get timely notice to victims is through the website. This case has been identified as a "Multi-Victim prosecution, and therefore all future correspondence will be through our office Website at www.usdoj.gov/usao/ct/multi-victim-updates.html (Please use lower case letters). For additional information, and copies of the indictments, please go to the Victim Notification Service (VNS) website at www.notify.usdoj.gov. You will need to use your VIN and PIN number which is provided to you in the attached letter.

Please check the website for future correspondence and case updates. You may also use the VNS website to update your personal information to include a valid email address and you can be notified by email.